

DEFENDANT’S PROPOSED INSTRUCTION 30-1

“Knew” or “Knowingly” – Defined

The term “knew” or “knowingly,” as used in these instructions to describe the alleged state of mind of a defendant, means that he was conscious and aware of his act, realized what he was doing or what was happening around him, and did not act because of ignorance, mistake, or accident.

A person who makes a statement which that person believes to be truthful, does not “knowingly” make a false, fictitious, or fraudulent statement.